

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

SHANNON FULGHEM,

Plaintiff,

Civil Action No. 4:13-cv-00276-SOW

v.

COMMERCIAL RECOVERY SYSTEMS, INC.,

Defendant.

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

Comes now the Plaintiff, by counsel, and respectfully requests that the Court enter a default judgment against the Defendant pursuant to Fed.R.Civ.P. 55(b)(2).

The Defendant has failed to plead or otherwise defend as required by the Federal Rules of Civil Procedure, and the time allowed for such pleading or defense has elapsed. An entry of Default was entered on June 25, 2013.

Plaintiff requests the following judgment be entered:

1. Plaintiff requests statutory damages pursuant to 15 U.S.C. § 1692k(a)(1) in the amount of \$1,000.00.
2. The Plaintiff requests 5.7 hours at \$250.00 per hour for attorney fees pursuant to 15 U.S.C. § 1692k(a)(3) for a total of \$ 1,425.00.
3. The Plaintiff requests to be awarded costs pursuant to 15 U.S.C. § 1692k(a)(3) in the amount of \$356.31 which includes the \$350.00 Court filing fee and \$6.31 in service costs.

4. The Plaintiff requests that the judgment will include applicable post-judgment interest.

Dated this 1st day of July, 2013.

Respectfully submitted,

By: /s/J. Mark Meinhardt
J. Mark Meinhardt, #53501
9400 Reeds Road, Suite 210
Overland Park, Kansas 66207
Telephone: (913) 451-9797
Email: mark@meinhardtlaw.com
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of July, 2013, a true and correct copy of the foregoing was mailed, first class postage prepaid, to:

Commercial Recovery Systems, Inc.
8035 E Rl Thornton Freeway, Suite 220
Dallas, Texas 75228-7145

and via electronic mail:

Jeff Wood
Associate General Counsel
Commercial Recovery Systems, Inc.
Office: (214) 321-7824
Fax: (214) 319-9673
jwood@crsresults.com

/s/Sherri S. Fisher
Sherri S. Fisher
Assistant to J. Mark Meinhardt